

JUDGE'S COPY

Copy (12)

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

YUDAYA NANYONGA,

Plaintiff,

vs.

IMMIGRATION NATURALIZATION
SERVICES, et als.,

Defendants

CIVIL NO: 1:00CV-1034
(JUDGE CALDWELL)

**FILED
HARRISBURG**

NOV 03 2000

MARY E. D'ANDREA, CLERK
Per afg
DEPUTY CLERK

**PLAINTIFF, YUDAYA NANYONGA'S
MOTION FOR ENLARGEMENT OF TIME**

Plaintiff, Yudaya Nanyonga, by and through counsel hereby requests a brief extension of time to November 17, 2000 to respond to Defendant, INS Federal Rule Civil Procedure 12 b (6) motion and states the following support thereof:

- 1) Plaintiff, Yudaya Nanyonga, was an alien detainee being held at the York County Prison, York, Pennsylvania. Presently, Nanyonga resides at 586 Purce Street, Hillside Township, New Jersey.
- 2) Nanyonga has sued various INS and York County Prison officials.
- 3) Plaintiff's response to Defendant's motion would be due on or about November 2, 2000.
- 4) Plaintiff, is in the process of reviewing its file to respond to the motion of counsel unfortunately, due to trial scheduling conflicts we cannot respond within the original 20 day extension time.
- 5) Accordingly, in order to file an appropriate response, Plaintiff requests that this Court grant a fifteen-day extension of time.

6) Counsel has conferred with Mr. Terez, attorney for Defendant, INS who has consented to a 15 day extension.

Wherefore, Plaintiff, Nanyonga requests this Court to grant her motion for a fifteen day extension of time to respond.

Respectfully submitted,

POPE, BERGRIN & VERDESCO, P.A.
Attorneys for Plaintiff


GARY A. CAVALLI

Dated: October 31, 2000

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CERTIFICATE OF CONCURRENCE

On October 30, 2000, undersigned counsel requested concurrence from Joseph Terez, counsel for the Defendant, INS, in a motion for enlargement of time. Counsel concurs in the motion. This certification is being provided in accordance with M.D. Pa. Local Rule 7.1.

Respectfully submitted

POPE, BERGRIN & VERDESCO, P.A.
Attorney for Plaintiff


GARY A. CAVALLI

Dated: October 31, 2000

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CERTIFICATE OF SERVICE BY MAIL

The undersigned hereby certifies that she is an employee in the Law Firm of Pope, Bergrin & Verdesco, P.A. and is the person of such age and discretion as to be competent to serve papers.

That on October 31, 2000, she served a copy of the attached

PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME

by placing said copy in postpaid envelope addressed to the person hereinafter named, at the place and address stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail at Newark, New Jersey.

Addressee:

Joseph J. Terz
Assistant U.S. Attorney
217 Federal Building
228 Walnut Street
P.O. Box 11754
Harrisburg, Pa. 17108

Dated: October 31, 2000


CAROL SEEGER